



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Williams Caudle
Director of Public Affairs
Audubon Materials
2200 North Courtney Road
Sugar Creek, Missouri 64050

Notice of Non-Compliance

RE: Clarios, LLC
St. Joseph, Missouri
ID: 110011105259

Dear Ms. Williams Caudle:

On March 3, 2022, a representative of the U.S. Environmental Protection Agency inspected the Clarios, LLC facility in St. Joseph, Missouri. This inspection was conducted pursuant to Section 114 of the Clean Air Act, 42 U.S.C. § 7401 et seq. The purpose of the inspection was to assess the facility's compliance with the Clean Air Act. A copy of the inspection report was e-mailed to you on May 9, 2022.

At the time of the inspection, the inspector identified the following violations:

- Clarios, LLC failed to keep required records of corrective actions when a pressure differential outside of the normal operating range was observed in violation of 40 CFR § 63.11423(b)(2)(iv)(A).
- Clarios, LLC was unable to produce a maintenance and inspection schedule for control equipment as required by Special Condition (C)(3) of Permit 032003-030A.
- Clarios, LLC was unable to demonstrate that the monitoring device for the scrubbing system had been calibrated to maintain an accuracy of ± 5 percent over its operating range in violation of 40 CFR § 63.11423(b)(1) & 40 CFR § 63.373.

On April 1, 2022, Clarios, LLC provided documentation via email that calibrations were performed for the Rotoclone gauges on March 29, 2022.

Within 30 days of receipt of this letter, please submit documentation describing the steps you have taken to develop and implement a preventative maintenance and inspection schedule for the baghouses in use at the St. Joseph Clarios, LLC facility. This information shall be provided to:



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Luke Rodriguez
ECAD-AB
U.S. Environmental Protection Agency
11201 Renner Boulevard
Lenexa, Kansas 66219.

Please note that correction of the violations does not prevent the EPA from pursuing appropriate enforcement actions, including penalties, for violations discovered as a result of the inspection. The penalties for Clean Air Act violations can be up to \$51,796 per violation per day of non-compliance.

Thank you for your prompt attention to this matter. Please direct all questions concerning this letter to me at (913) 551-7564 or to Mr. Rodriguez at Rodriguez.luke@epa.gov.

Sincerely,

Tracey Casburn
Chief, Air Branch
Enforcement and Compliance Assurance Division

cc: Brian Hutchins, IDNR
Mark Fields, IDNR
Julie Duke, IDNR